



**RULES OF PROCEDURE
FOR THE AFFILIATED COMPANIES OF EHRMANN SE
COMPLAINTS PROCEDURE WITHIN THE MEANING OF SECTION 8 LKSG**

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1. Scope of Application

The parent company, Ehrmann SE, along with the subsidiaries of the Ehrmann Group, (hereinafter referred to as 'Ehrmann'), actively complies with the requirements set forth by the German Supply Chain Due Diligence Act (LkSG) to ensure guaranteed compliance with human rights and environmental standards within our supply chains and own business operations. Section 8 of the LkSG requires the establishment of a complaints procedure.

The procedure enables internal and external persons to report human rights and environmental risks and violations of human rights-related or environmental obligations. The specific details and process of this procedure at Ehrmann are set out in these rules of procedure in accordance with the LkSG.



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2. Complaint Channels

To submit complaints or provide information within the framework of the LkSG, you may utilize our complaints platform available to you. The platform can be accessed via the following link:

https://sicher-melden.de/Ehrmann_LkSG

Alternatively, the following QR code can be scanned using the camera function of a mobile device (e.g., cell phone or tablet) to access the reporting platform.



The platform is accessible free of charge to whistleblowers. In addition to internal notifications, the complaints channel can also be accessed via the link published on our website.

Ehrmann employs the Otris complaints platform as an internal complaints channel. This platform is ISO27001 certified and is operated exclusively in German data centres. SONNTAG IT-Solutions is entrusted with managing the complaints procedure, acting as a neutral body by receiving reports submitted via the Otris complaints platform and coordinating with the contact persons at Ehrmann.

To ensure compliance with the legal requirements in accordance with LkSG §8, Ehrmann has implemented a reporting process designed to record, document and follow up on all reports.



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Information from employees can also be reported directly to the management, the Works Council or to the Human Rights Officer. Regardless of the reporting channel, all reports are checked for relevance and processed according to a defined procedure.

This procedure is also accessible on the website www.ehrmann.de.

In principle, any individual is entitled to report complaints or information within the meaning of the LkSG report. Human rights and environmental risks and violations of human rights, as well as environmental human rights and environmental obligations within the company's own business operations and supply chain, may be reported. These reports particularly include:

- Slavery
- Economic exploitation
- Forced or child labour
- Disregard for occupational health and safety and work-related health hazards
- Disregard of the freedom of association
- Unjustified unequal treatment in the employment relationship
- Violation of minimum wage regulations
- Destruction of natural resources through environmental pollution
- Unlawful violation of land rights
- Commissioning or use of private or public security forces in violation of human rights
- Disregard for human rights
- Other acts or omissions in breach of duty that seriously impair protected legal positions
- Disregard of environmental protection prohibitions (Minamata Convention¹, POPs Convention², Basel Convention³)

[1 Minamata-Übereinkommen](#)

[2 POPs-Übereinkommen](#)

[3 Basler Übereinkommen](#)



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3. Course of Proceedings

a. Complaints Procedure Process:

Upon submitting a report or complaint to the reporting centre
(Otris complaints platform and employees of Sonntag IT Solutions):

- (1) the Reporting Centre shall confirm receipt of a report to the whistleblower no later than after seven days after submission,
- (2) the Reporting Centre shall assess whether the reported breach falls within the material scope of the application of the LkSG; in the event of a rejection, the whistleblower will receive a statement of reasons,
- (3) the Reporting Office shall maintain in contact with the whistleblower and inform him or her about the expected timeline of the complaints procedure and their rights with regard to protection against discrimination or punishment,
- (4) the Reporting Centre shall verify the validity of the received report; if necessary, the reporting individual will be offered a dispute resolution procedure,
- (5) if required, the Reporting Centre shall request additional information from the reporting individual and, if necessary, collaborate with the whistleblower to develop proposals for follow-up measures as described in the LkSG, and
- (6) the Reporting Centre shall implement appropriate follow-up measures; and
- (7) within 3 months of issuing the confirmation of receipt, the Reporting Centre shall evaluate the outcome achieved with the whistleblower.



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b. Anonymity and Protection against discrimination/punishment on the basis of a complaint

4. Protection of Whistleblowers

Reports or complaints may be submitted anonymously via Otris. The complain channel ensures the technical anonymity of the whistleblower, making it impossible to trace their identity through technical means.

The confidentiality of the whistleblower's identity is also assured in the case of non-anonymous submission of information or reports. When processing personal data, the reporting centres adhere to all data protection regulations, particularly the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG). The complaints channel operates impartially and independently, free from any instructions from Ehrmann.

Individuals providing information shall not be subject to any personal or legal disadvantages or penalties.



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5. Review of the effectiveness of the complaints procedure

The effectiveness of the complaints procedure is reviewed at least once a year or as needed.

Evaluations of the information received to date, subsequent procedures, and regular analyses are conducted.

The guidelines of the Federal Office of Economics and Export Control concerning the complaints procedure are duly considered.

6. Contact for questions and information

For any inquiries regarding these Rules of Procedure, the complaints procedure or other matters related to human rights or environmental law, please contact our Human Rights Officer via e-mail at

menschenrechtsbeauftragter@ehrmann.de

The Rules of Procedure for the Complaints Procedure and the Declaration of Principles on Respect for Human and Environmental Rights can be found at

www.ehrmann.de